REMARKS

The application now includes claims 1-16, 18-23, 25-27, 34-36, 38, 42-44 and 51-67. Claims 1-4, 13, 25-27, 34-36, 38 and 42-44 were amended. Claims 25-27 and 38 were amended only to change their dependencies. Claims 2-4, 34-36 and 42-44 were amended to conform to their parent claims without substantially changing their scope. The amendments of claims 1 and 13 are discussed below.

Claims 17, 24, 28-33, 37, 39-41 and 45-50 were cancelled to reduce the number of claims in the application. Claims 51-67 are new.

Support for new claims

Claim 51 finds support, for example, on page 24, lines 34-page 25, line 2:

"It should be appreciated that in many cases, the data which is transmitted from the data source to the conversion server is already in a format suitable for the client, such as HTML. The data is preferably transmitted from the data source using an Internet protocol, such as a WWW protocol."

Claim 52 finds support at least on page 7, lines 14-16:

"Thus, in a preferred embodiment of the invention, an automatic converter brokers information between a client and an information provider, while providing and presenting the information to the client in a form which is not easily copied."

in view of page 5, lines 14-15:

"An automatic converter, in accordance with preferred embodiment of the invention is integrated into a client-server relationship as a (hidden) proxy."

Claims 53 and 57-59 find support at least on page 7, lines 3-24. Claims 60-61 find support at least on page 22, lines 8-17. Claim 62 finds support at least on page 23, lines 31-33. Claim 63 finds support at least on page 7, lines 14-16. Claims 54-55 and 64-66 find support at least on page 7, lines 17-24 and/or on page 22, lines 20-30. Claims 56 and 67 find support at least on page 20, lines 12-13.

Response to 112 rejections

Claims 1-50 were rejected under 35 USC 112, first paragraph, as containing new matter. The Examiner specifically related to the following terms:

"data source has a limited access to a client"

"displaying the modified information at the client using a standard web browser without requiring user intervention to facilitate downloading or activation of viewers of said information"

"said requesting and said displaying do not use any software which is of a type inherently capable of interaction with the client station other than for input handling and display."

"said information is not encrypted prior to said displaying"

Although applicant is of the opinion that these terms are supported by the application as filed, claim 1 was amended and claims 29 and 47-50 were cancelled in order to remove these terms and further the prosecution toward allowance. Applicant notes, however, that support for download without client intervention can be found on page 20, lines 12-13, which read:

"First, the applets are downloaded with the page that requires them and without any intervention of the client."

Claims 1-50 stand rejected under 35 USC 112, second paragraph, as lacking clarity. The limitations related to by the Examiner as being unclear were cancelled by applicant.

Claim 1 was further amended for clarity to specifically state a client request for information. This limitation was taken from claim 17, which was cancelled. This amendment makes explicit, that which was implicit, that the information is supplied in response to a client request. Support for the amendments can be found for example on page 14, line 2 and page 24, lines 17-18.

The amendments to claim 1 broaden the claim.

Claim 1 obviousness rejection

Claims 1-3, 5-20, 22-29, 31-34 and 37-50 were rejected under 35 USC 103(a) as being unpatentable over Rabne et al 6,006,332, in view of Tso et al 6,185,625.

Claims 4 and 30 stand rejected under 35 USC 103(a) as being unpatentable over Rabne et al 6,006,332 and Tso et al 6,185,625, and further in view of Chaddha et al 5,621,660.

Claims 21 and 35-36 stand rejected under 35 USC 103(a) as being unpatentable over Rabne et al 6,006,332 and Tso et al 6,185,625, and further in view of Gerace 5,991,735.

Applicant respectfully submits that the Examiner has not established a *prima facie* case of obviousness, since there is no suggestion in the art to combine Rabne et al 6,006,332 and Tso et al 6,185,625 and in fact, Rabne and Tso teach away from such a combination.

Claim 1 requires transmitting information in an original format, from the data source to a proxy server and converting the information, at the proxy server, from the original format to a modified form, in which the information is less available for copying than in the original format.

As stated in MPEP 2142:

"there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings."

Rabne relates to a secure rights management (RM) server which provides data in a restricted manner. As acknowledged by the Examiner, Rabne does not describe transmitting information in an original format, from the data source to a proxy server, and converting the information at the proxy server.

Tso describes a proxy server that encodes and scales data according to the needs of a client to which the data is provided.

Lack of motivation to combine

The Examiner states that it would be obvious to modify Rabne so that the data is converted into a restricted format by a proxy, rather than being provided in a restricted manner by the RM server. The Examiner, however, has not provided any motivation to have a proxy perform the conversion into the restricted format instead of having the data in a protected format already in the source. The Examiner's statement that it would be desired to use a proxy in order to protect a LAN from unauthorized access from the Internet only explains why it would be desired to have the signals transmitted from the RM server to the client pass through a proxy. The need to protect the client does not suggest any motivation to convert the signals into a modified form in the proxy. As is well known in the art, most proxies do not modify data passing through them at all, but only cache the requested content (Tso, col. 5, lines 11-49), and still provide the required LAN protection (Tso, col. 4, lines 58-59). Even if a proxy were to convert the signals transmitted from the RM server to the client into a modified form, for example the modification suggested by Tso, there is no motivation in the art to have the proxy modify the signals to make them less available for copying.

Furthermore, the motivation provided by Tso to perform its encoding in a proxy, namely to accommodate to the fact that some clients connect over slow connections and others connect over fast connections (col. 4, lines 40-50), is not relevant to the modifications required for copyright protection. As stated by Rabne, "communications between the RM server and any RMc browser must be encrypted to protect the intellectual property during network transmission." That is, all communications provided by the RM server must be encrypted and there is no need to accommodate the data itself to different client needs. Rabne handles the different client needs through different types of RMc browsers and/or different commands to the browser (col. 4, lines

8-11, col. 18, lines 20-32) and therefore has no gain from performing the conversion of the information signals in a proxy.

References teach away from combination

In addition to the lack of any motivation to combine the teachings of Rabne and Tso, both these references provide reasons why such a combination is not desired. Tso (col. 5, lines 11-14) warns that the two stage data access procedure in using a proxy is relatively slow. While Tso determined that this slowdown is worthwhile in order to enhance data delivery to clients having limited connection bandwidth (i.e., the slowdown is compensated by the reduced bandwidth of data), there is no reason in Tso or Rabne why to accept such a slowdown in order to provide copyright protection in the proxy and not in the data source. Applicant notes that the delay added by a proxy increases with the number of tasks performed by the proxy. Performing the additional task of copyright protection by the proxy adds additional delay to the operation of the proxy. Such delay may be especially problematic with real time copyright data.

Also Rabne teaches away from combining the teachings of Rabne and Tso. The purpose of Rabne is to protect intellectual property rights. To do so, it is desired to minimize the points at which the copyrighted data can leak. Therefore, the simple choice of any data owner would be to protect the data at its source and not at a proxy along the path to the client. This is repeatedly emphasized in Rabne. On col. 1, lines 24-27, for example, Rabne warns from the dangers involved in leaving data unprotected - "A person wishing to mis-use digitized intellectual property will be able to intercept the material on the Internet, on an Intranet and/or at an end-user's computer." Therefore, a solution in which the data is unprotected on its way to the proxy would not be acceptable to a reader of Rabne. On col. 6, lines 42-45, Rabne states that "communications between the RM server and any RMc browser must be encrypted to protect the intellectual property during network transmission." On col. 10, lines 63-64, Rabne states that "RM server is configured to have a secure communications channel with RMc trusted browsers 36". Furthermore, on col. 18, lines 12-15, Rabne states that "While the present system must control initial access to the intellectual property ...". See also, col. 11, lines 59-61. It is therefore clear that any reader of Rabne would not consider modifying its teachings to a system in which the transmissions of the data from their source are not protected. Even if a proxy is used, Rabne implies that the signals transmitted to the proxy are copyright protected. Therefore, there would be no reason to perform the copyright protection in the proxy.

In view of these arguments, applicant submits that the Examiner has not established a *prima facie* obviousness case against claim and claim 1 is patentable over the art of record. The dependent claims are patentable at least by virtue of their parent claims.

Dependent claims

Nonetheless, at least some of the dependent claims add further patentability over the cited art. Claim 11, for example, requires converting only a portion of the information. Applicant did not find this limitation in columns 10-14 of Rabne. If the Examiner insists on the rejection, applicant respectfully requests that the Examiner provide a more specific pointer, which will allow applicant to determine the basis of the Examiner's rejection and respond accordingly.

Claim 13, for example, was amended to emphasize that the converting makes the displayed information less available for copying. This simply brings the limitation of the parent claim into dependent claim 13.

Applicant did not find in Tso or Rabne a suggestion to change the format in a manner which makes it less available for copying. Any changes in format suggested by Tso are not related to the availability of copying of the information. In Rabne, changes to the data include addition of a watermark or fingerprint (col. 20, lines 34-37) and not a change in format of the data.

Claim 20, for example, requires that the conversion modifies at least one text object to at least one non text object. This is not taught or suggested by Rabne. Col. 20, lines 12-18, referred to by the Examiner relates to changing the presentation of the browser, not to changing a text object of the transmitted information into a non text object.

Patentability of new claims

New claim 57 requires converting information into a second format, in which display of the information is easily accessible to the senses of a consumer, but is less accessible to data manipulation tools on a computer performing the display, than in the first format.

This is not taught or suggested by Rabne. In Rabne, either information is added to the protected information (col. 20, lines 34-37) or the browser is controlled to limit copying (col. 20, lines 12-18). Rabne does not teach or suggest changing a format of the information in order to reduce accessibility to data manipulation tools, as required by claim 57.

The dependent claims add further patentability over Rabne. Claim 58, for example, requires that the first format comprises a page and that the second format includes a temporally modulation of the information, such that only small parts of the information are displayed at any instant. This is not taught or suggested by Rabne or by Chaddha. Rabne relates to restricting access to copyrighted information, but does not suggest doing so by temporally modulation of the

contents of a page. Chaddha relates to an encoder for scalable video. Chaddha does not teach or suggest temporally modulating a page. Furthermore, Chaddha does not relate at all to restricting copying and the Examiner did not suggest any motivation to combine Chaddha to Rabne. The Examiner's remark that it would have been obvious to combine Chaddha to Rabne and Tso to prevent copyright infringement is not supported by the Examiner by any teaching of the art.

New claim 64 requires receiving transmitted information in a format not supported by a simple browser and displaying the received information by the simple browser using an applet, in a form in which the information is less available for copying than a freely copied format.

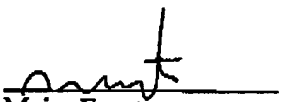
This is not taught or suggested by Rabne. In Rabne, a dedicated browser is required for the handling of copyrighted data (col. 11, lines 38-49). Rabne suggests using applets to display copyrighted data (col. 23, lines 13-37), but notes that simple browsers cannot be used (col. 23, lines 17-18) and a dedicated base browser is required to implement its methods and overcome the inherent security features of Java.

Applicant notes that the "simple browser" may be in itself very complex, as long as it is not a dedicated browser. In Rabne, the simple browser cannot be used purposely for copyright protection reasons and not incidentally due to lack of ability.

Conclusion

In view of the above remarks, the claims are believed to be ready for allowance. Allowance of the claims is respectfully awaited. In the event that the Examiner does not agree to allow the claims, but feels a telephone conversation can forward the application to allowance, the Examiner is respectfully requested to call the undersigned at (toll free) +1 (877) 428-5468. This telephone connects directly to the undersigned's office in Israel, which is 7 hours ahead of Washington. Our normal work week is Sunday through Thursday and the undersigned is generally available until 11:00 AM, Washington time.

Respectfully submitted,
E. MARMOR



Maier Fenster
Reg. No. 41,016

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William H. Dippert, Esq.
Wolf, Block, Schorr & Solis-Cohen LLP
250 Park Avenue
New York, NY 10177

Tel: (212) 986-1116